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June 12, 2008

**Via Electronic Filing**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re:** Notice of *Ex Parte* Presentation in CC Docket Nos. 96-45 and 01-92

Dear Ms. Dortch:

On behalf of the Rural Alliance, Robert J. DeBroux, Director, Federal Affairs and Public Policy for TDS Telecom, Paul Cooper, President of Fred Williamson and Associates, and I met with Scott Bergmann, senior advisor to Commissioner Adelstein. We discussed the Commission's May 2, 2008, News Release entitled "Interim Cap Clears Path For Comprehensive Reform."

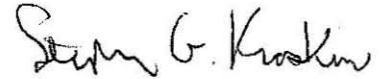
We suggested that adoption of the Missoula Plan submitted in CC Docket No. 01-92 will serve the public interest by addressing issues regarding reform of intercarrier compensation. We discussed the fact that many rural carriers, consistent with applicable rules and regulations, currently recover a significant percentage of their regulated costs from intercarrier compensation in the form of interstate and intrastate access charges. We addressed the desirability of a uniform interconnection rate, as proposed in the Missoula Plan, and noted the resulting decrease in cost recovery for rural carriers that will result from the implementation of access rate reductions.

If intercarrier compensation revenues are decreased for rural carriers, "demand on the Fund increases as offsetting support payments go up," as the Commission recognized in its May 2 News Release. We expressed concern that the necessary continued investment in infrastructure to provide universal service in rural carrier service areas requires a stable predictable and sufficient regulatory framework, as contemplated by Section 254 of the Telecommunications Act of 1996. In this regard we expressed concern with any proposal to

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subject rural carrier infrastructure investment to the uncertainties of an auction process applied to the recovery of the network costs incurred by rural carriers in their provision of universal service as carriers of last resort.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen G. Kraskin". The signature is fluid and cursive, with the first name "Stephen" and last name "Kraskin" clearly legible.

Stephen G. Kraskin

Attachments

cc: Scott Bergmann